



March 7, 2014

Via Electronic Comment Filing System

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 10-90 –Expression of Interest in Conducting Rural Broadband Experiment

Dear Ms. Dortch:

Enclosed for electronic filing via the Electronic Comment Filing System ("ECFS") in compliance with Federal Communications ("FCC") Order, FCC 14-5, is the attached non-binding Expression of Interest ("EOI") for OmniTel Communications, ("OmniTel") regarding the Connect America Phase II network experiments. OmniTel appreciates the opportunity to file the non-binding EOI.

If you have any questions or concerns on the attached EOI, please contact me.

Respectfully Submitted,

A handwritten signature in black ink that reads "Ronald J. Laudner, Jr." in a cursive script.

Ron Laudner
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Attachments (Non-binding EOI)

Non-Binding Expression of Interest – Phase II Rural Broadband Experiment

OmniTel Communications, (“OmniTel”) submits this Expression of Interest (“EOI”) for Connect America Phase II Rural Broadband Experiments per Federal Communications Commission (“FCC”) Order, FCC 14-5. This is stage 1 of the FCC’s Phase II experiment proposals and OmniTel anxiously awaits release of the Stage 2 formal proposal requirements.

Entity Background

OmniTel, headquartered in Nora Springs, was founded in 1904 as a rural independent telephone company. For over 100 years, making the communities we serve better places to live, work and play, has been our mission. Of course 100 years ago, we accomplished that mission by supplying these communities with wireline telephone service. Today we are continuing our commitment by providing the most up-to-date fiber optic infrastructure.

A fiber optics network will keep those we serve more connected. The value in this network goes far beyond connecting our communities with their friends and families. It makes it possible for new businesses to relocate in our rural communities. It brings distance learning opportunities to our schools. And it links our medical facilities to major hospitals, bringing world-class medical care and expertise to all of us- no matter where we live.

OmniTel’s commitment spans with its continual planning and its work with neighboring communities to extend out Broadband access. One proposed result of this commitment is the ***“Grow Howard County: Transforming Rural America - Food, Fuel and Fun”***, which is the basis of this EOI.

Introduction

The *Transforming Rural America* concept is one way in which OmniTel is working with neighboring communities with the redesign of rural America by connecting the “dots” to bring Broadband to the rural unserved locations in the State of Iowa. Through this project, OmniTel will be focusing on the creation of a Public-Private Partnership to accelerate and facilitate change within Howard County in Iowa. A partnership with the Howard County Task Force would be formed whereby together we would bring one (“1”) GigaBit (“GB”) connection to areas where a strong high speed Broadband connection it is currently lacking. We would be connecting the rural areas to provide for advanced learning and an overall contribution globally. The Howard County Task Force consists of the Howard-Winneshiek School District and Howard County Business & Tourism.

Howard County is located along the border in beautiful NE Iowa. Howard County is an outdoor enthusiasts dream with multiple rivers such as the Upper Iowa and Turkey, creating a stunning landscape. US Highway 63 dissects the county into east and west, while IA Highway 9 equally separates north and south, both affording business and industry great locations to be connected to the nation. With a modest population of 9,566, Howard County is a net importer of workers for the many companies that love to call this their home. However, there is one important commodity has been left unattended for too long within this rural area. The rural area is currently lacking a strong Broadband offering.

Residents of Howard County believe they are the epicenter of deep systemic change. They have a realization that the world is at a “printing press” moment in the history of mankind. In that, the printing

press facilitated the exchange of ideas and thinking, transforming every system of that day. Digital devices connected via robust and reliable Broadband is doing the same today. With the advance of technology, what the printing press did in decades, digital devices are doing in years. The rate of change is accelerating exponentially through the use of Broadband.

Project Background

To provide some background on how *Transforming Rural America* came to be, a look at how Howard County is moving to redesign and redefine rural America is needed. County wide, we have been seeing a decline in population. We have jobs that we are unfortunately unable to fill due to the fact people have been leaving. *Task Force: Howard County* was formed and within the last 90 days government, education, banking, business and industry representatives have come together to create a Private/Public Partnership to *GROW HOWARD COUNTY*. The goal of which is to create “package deals” to recruit families to Howard County region. The following have been identified by the task force as key items to focus on:

- Highlight jobs, housing, education, quality of life, opportunity
- Target young adults, families that want to come back to NE IA, Veterans, Mayo Clinic employees and clients (*Rochester, MN is only an hour drive*)
- Apply to become a “Home Base Iowa Community”
- Participate in “Connect Iowa’s Community Engagement Program”
 - Howard County has been unable to become a Connect Iowa Community due to the low scores in the Access Assessment. See table below for Access Assessment scores:

Category	Score	Category	Score
Howard County's overall score	18 out of 40	Broadband Availability	2 out of 10
Broadband Speeds	1 out of 5	Broadband Competition	1 out of 5
Middle Mile Access	4 out of 10	Mobile Broadband Availability	10 out of 10

Cresco, IA is one of the main communities within Howard County that we are looking at. The town is currently served with high speed and robust Internet service. However, that service stops short of the town limits. Once you reach out in to the rural areas, our residents are basically unserved and shut off from the Internet world. This is very restrictive to the community, especially to education, which includes: Northeast Iowa Community College (“NICC”) and Howard-Winneshiek Community School District (K-12). NICC has a stand-alone center on the Howard-Winneshiek Crestwood High School Campus. Howard County and portions of Winneshiek and Chickasaw counties are served by the **Howard-Winneshiek Community School District**. The District has total enrollment of 1,300 students and spans an area of 426 square miles. Elementary campuses are currently in Elma, which unfortunately is scheduled to close in 2014, Lime Springs and Cresco. The 7-12 secondary campuses are in Cresco. In the district, every student has been issued a digital device, ranging from iPads to MacBook Airs (see the following link: <http://www.youtube.com/watch?v=JrbAYl4mQos>). In addition, every classroom in the school has been set up with an Apple TV and Smart Board (<http://www.youtube.com/watch?v=dm8838HytpQ>). The district also has two 3D printers at the K-8

Cresco campus. As reflected above, our school is very driven in providing advanced technology opportunities to our students.

The Cresco campus (K-12) has 300 MG upload and download. In Elma and Lime Springs there is 105 MG download and 6 MG upload. Unfortunately, our students DO NOT have this capacity at their homes, which makes utilizing the school provided technology non-functioning at home. Due to this fact, it is not uncommon for students to remain in town during the evenings, whether it is at the school, at grandparents or other houses that are within the town limits in order to complete their homework.

OmniTel is excited about the progress the school district has been showing with its technology initiatives. In addition to the above, the district prides itself with the “Project Lead the Way” which it implemented in 7th grade. With the technology initiatives implemented, the Howard-Winneshiek Class of 2020 will be the most prepared and most in demand students coming out of the area. This is something that we stand proud of and are looking forward to seeing this to fruition with the “Grow Howard County” transformation.

Proposed Service Area

The proposed service area covers the following census tract numbers in Howard County: 19089960200 and 19089960300. *Grow Howard County* project is estimated to provide Broadband access to a total of 881 locations identified by the FCC’s Experiment Eligible Locations spreadsheet considered as Eligible High Cost locations once completed.

Howard County has a land area of 473 square miles, with a population density of 20 people per a square mile. The county is 67% rural with the largest city (Cresco) in the county having a population of 3,868 and the remaining five (5) towns in the county having populations less than 550 people. Howard County is a true rural community. The rural environment is an asset to the quality of life in Howard County, by providing opportunities for recreation, education, and a choice lifestyle. It is a road block however, to the prosperity of the county and its citizens. As stated above, Broadband is transforming the world as we know it and at a record pace. People who have fast, reliable access to Broadband have the world at their fingertips. Those who do not will fall further and further behind in areas such as education, healthcare, and economic development. As it stands today, Howard County is falling behind due to the large population of underserved and unserved citizens in the county. Below are examples of how the lack of access to Broadband has negatively affected Howard County:

- In December 2013, a staff member of Northeast Iowa Community College center in Cresco came to work to find a student sitting outside the building in -30 degree temperatures, trying to complete his homework. He did not have access to the Broadband at home, and was using the wireless Broadband from the center to gain access.
- A women who telecommutes to work, had to purchase a substandard home in the city of Lime Springs so she could have Broadband access. The farm where she lived, several miles outside city limits, did not have Broadband. She now has the added expenses of heating, taxes, water, sewer, and electrical charges for a second house stressing her income. Expenses that could have been avoided if she had Broadband access on the farm where she lived.
- The Howard Winneshiek School District covers 426 square miles. The large district creates a challenge when it comes to inclement weather. As of March 6, 2014 there have been 9 school days which have been cancelled due to weather conditions, with the possibility of

more before the school year ends. If Broadband was available throughout the school district, an opportunity to use “e-days” to make up the days could be offered in place of adding missed days to the end of the school year.

- Regional Health Services of Howard County, the local medical center, has a patient portal that allows patients online access to their health information/records. The very nature of the medical center’s name is true to its use as patients come from all over the rural region but many are unable to access these records from the lack of Broadband. Individual patient access is also critical during medical emergencies as first responders need this information in order to stabilize and transport patients.

Broadband Technology

OmniTel anticipates building out Fiber-to-the-Premises (FTTP) for this proposed project area in order to build a much needed high-speed, robust, scalable Broadband network. The FTTP network architecture would provide a robust, Broadband networking solution that offers virtually unlimited bandwidth and the flexibility to meet the customers demand for two-way, interactive, multimedia-based services for years to come. FTTP technology will enable OmniTel the ability to offer the residents in the rural area with the same level of Broadband services that is being experienced within town. Those services have been highlighted above, but also include carrier-class telephony, high-speed Internet access, digital multimedia, Voice over Internet Protocol (VoIP), and interactive, two-way Broadband services. OmniTel has extensive experience with building and maintaining an extensive FTTP network.

Service Offerings

The service offerings anticipated by OmniTel are voice service and high-speed Broadband service. The following speed tiers are expected to be available to all homes and businesses passed within the proposed project area, including those Community Anchor Institutions as referenced above, 5MB, 10MB, 15MB, 50MB and 100MB at prices comparable to rates in neighboring communities. OmniTel estimates the project to be completed within 18-24 months. Build out will be dependent on construction conditions.

Other Entity Participation

In addition to the partnership with the Howard County Task Force and its support, this project is anticipated to include support from the following local business partners: Donaldson Co., Featherlite Inc., Alum Line Inc., Plantpeddler, Cresco Foods/AVEKA, Lime Springs Beef and McNeilus Co.

Howard County sits approximately 50 miles from the Mayo Clinic. It was recently announced that Mayo would be hiring approximately 30,000 new people who reside within a 1 hour circle radius from the clinic. This poses to be a huge opportunity for our community. However, with this opportunity lies a disadvantage. Those who may be qualified to be an employee of the clinic and who live in the rural area which is currently lacking Broadband will be restricted. The ability to telecommute and allow an employee to work from the home will not be available to the rural residents in this area. This is a hardship that shouldn’t have to exist.

Funding

OmniTel has not completed a detailed engineering design yet to determine actual costs to build out a FTTP network, costs which will be dependent on density, route miles and terrain. However, based on prior FTTP projects OmniTel has completed which were similar in nature, it is estimated that this project could have an approximate cost of \$7,500 per location passed. Based on the locations listed, a total estimated cost would be \$6,600,000 with requested government funding of \$6,600,000. The requested funding amount will be \$3,300,000 being requested each year over a 2 year period to coincide with the construction build. OmniTel will be completing a detailed engineering design prior to submission of its proposal to firm up the actual costs that would be attributed to this project.

Conclusion

OmniTel and the Howard County Task Force appreciate the opportunity that the FCC is providing by allowing the submission of an Expression of Interest for the Rural CAF Experiment. As stated above, we are considering a FTTP network build within Howard County in Iowa. The fiber network would provide the residents, businesses and CAI's with a high-speed, robust, scalable Broadband network. The *Grow Howard County: Transforming Rural America* would be able to come to fruition. Part of this vision entails the Class of 2020, which will be the most recruited group of students nationwide. These students will be a 'tech ready' work force with 21st century, employable skill sets. The network would accelerate change for the betterment of the entire county, and will enable Howard County to offer 21st century quality of life centered on jobs, education, recreation, health care, housing, & Broadband. The network architecture OmniTel is considering would provide a Broadband networking solution that offers virtually unlimited bandwidth to an area that has been lacking service.

OmniTel is a very strong, healthy, dedicated and committed telecommunications provider. The staff is extremely knowledgeable and holds the wherewithal to complete the FTTP overbuild to fulfill *Grow Howard County* vision while delivering advanced services to each person who lives and works within the proposed service area.

Live, work, and play in Howard County and be connected to the world!